

1 ADAM L. BRAVERMAN  
United States Attorney  
2 BRUCE C. SMITH  
Assistant U.S. Attorney  
3 California State Bar No. 078225  
Federal Office Building  
4 880 Front Street, Room 6293  
San Diego, California 92101-8893  
5 Telephone: (619) 546-8266  
E-mail: [bruce.smith@usdoj.gov](mailto:bruce.smith@usdoj.gov)

6 Attorneys for Plaintiff  
7 United States of America

8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 \$22,120.00 IN U.S. CURRENCY,

14 Defendant.

Case No. **'18CV2697 DMS NLS**

COMPLAINT FOR  
FORFEITURE

15  
16 By way of complaint against the defendant \$22,120.00 IN  
17 U.S. CURRENCY ("\$22,120 in currency"), plaintiff UNITED STATES  
18 OF AMERICA alleges:

19 1. This Court has jurisdiction over this action by  
20 virtue of the provisions of Title 28, United States Code,  
21 Section 1355(a) and Title 21, United States Code,  
22 Section 881(a)(6), because the defendant \$22,120 in currency  
23 constitutes money furnished or intended to be furnished in  
24 exchange for a controlled substance, or proceeds traceable to  
25 an exchange for controlled substances in violation of  
26 Chapter 13 of Title 21, United States Code.

27 2. Venue is proper in this district pursuant to  
28 //

1 Title 28, United States Code, Section 1395 because the  
2 defendant \$22,120 in currency was found in this district.

3 3. On June 27, 2018, in the Southern District of  
4 California, at the San Diego International Airport ("SDIA"),  
5 members of the San Diego Integrated Narcotics Task Force  
6 ("NTF") Commercial Interdiction Unit were on duty, seeking to  
7 intercept and seize controlled substances and proceeds from  
8 the sales of controlled substances passing through  
9 the airport.

10 A. The Task Force officers ("TFO") were trained and  
11 experienced, and knew that persons engaged in the commercial  
12 interstate distribution of controlled substances frequently  
13 used SDIA, and the aircraft that arrived and departed there,  
14 to distribute controlled substances throughout the  
15 United States.

16 B. The Task Force officers were trained and  
17 experienced, and knew that persons engaged in the commercial  
18 interstate distribution of controlled substances frequently  
19 used SDIA, and the aircraft that arrived and departed there,  
20 to transport drug sales proceeds and funds to be used to  
21 purchase drugs in and out of San Diego. Those proceeds and  
22 funds were usually in the form of United States currency.

23 C. The Task Force officers were trained and  
24 experienced, and knew persons engaged in the commercial  
25 interstate distribution of controlled substances  
26 frequently used couriers to transport controlled substances,  
27 drug sales proceeds, and funds to be used to purchase drugs  
28 in and out of San Diego. SDIA and the aircraft that arrived

1 and departed there are relied upon as a means of sending and  
2 receiving such couriers.

3 4. On or about June 27, 2018, NTF Task Force officers  
4 and Drug Enforcement Administration ("DEA") agents assigned  
5 to NTF Team 8 at SDIA learned that AL JACKSON ("JACKSON") was  
6 traveling from Gulf Port, Mississippi to SDIA aboard  
7 United Airlines Flight 1919.

8 A. JACKSON was traveling from Mississippi to SDIA  
9 on a one-way ticket, purchased within 24 hours of the  
10 scheduled departure time for the flight.

11 B. JACKSON, a resident of Biloxi, Mississippi, did  
12 not purchase a ticket for a return flight.

13 C. The Task Force officers learned JACKSON was  
14 flying with no checked luggage.

15 D. The TFOs and DEA agents had specialized training  
16 and were experienced in investigating illegal drug and drug  
17 currency couriers. They knew the purchase of a cross-country,  
18 one-way airline flight ticket less than 24 hours before  
19 departure is unusual, and can be indicative the traveler is  
20 an illegal drug or drug currency courier.

21 E. The TFOs and DEA agents knew the general  
22 traveling public will purchase round-trip airline tickets  
23 weeks or even months in advance of the scheduled  
24 departure date.

25 F. An advance round-trip ticket purchase results in  
26 lower fares for the traveler. Purchasing an airline ticket  
27 even a week in advance of departure all but guarantees one  
28 will pay the highest fare.

1           G. The TFOs and DEA agents had specialized training  
2 and were experienced in investigating illegal drug and drug  
3 currency couriers. They knew illegal drug and drug currency  
4 couriers often times do not know when drugs or currency will  
5 be available for transport until the last minute. The nature  
6 of illegal drug trafficking, and its uncertainties, often  
7 compels couriers and their employers to purchase airline  
8 tickets close to the departure date.

9           H. The TFOs and DEA agents were trained and  
10 experienced, and knew the Southern District of California is  
11 a primary source region for controlled substances cultivated  
12 and manufactured on the west coast of the United States  
13 ("west coast"), Latin America, and elsewhere.

14           I. The TFOs and DEA agents were trained and  
15 experienced, and knew controlled substances cultivated and  
16 manufactured on the west coast, in Latin America, and  
17 elsewhere were sent and distributed for resale from source  
18 regions such as San Diego to all points north and east within  
19 the United States. In their experience, Mississippi was a  
20 known destination market for controlled substances.

21           5. The TFOs and DEA agents researched JACKSON's  
22 criminal history.

23           A. JACKSON had a history of arrests in the State of  
24 Mississippi for, among other things, in 2013 for illegal  
25 possession of controlled substances, possession of marijuana,  
26 and illegal possession of a controlled drug.

27           B. JACKSON had a history of arrests in the State of

28 //

1 Louisiana and a conviction in 2014 for possession of  
2 marijuana, a controlled substance.

3 6. On June 27, 2018, just before 10:45 a.m. in SDIA  
4 Terminal Two, Gate 39, the TFOs and DEA agents prepared for  
5 the arrival of United Airlines Flight 1919 and  
6 passenger JACKSON.

7 7. At approximately 10:45 a.m., shortly after  
8 United Airlines Flight 1919 landed, the TFOs and DEA agents,  
9 armed with a physical description of JACKSON, located him as  
10 he exited the jet way from Gate 39 and walked into  
11 the terminal.

12 A. The TFOs and DEA agents noted JACKSON was wearing  
13 a dark grey T-shirt, jeans, and was carrying a teal colored  
14 fabric carry-on bag.

15 8. DEA Special Agent Beauchamp ("Agent Beauchamp") and  
16 DEA Special Agent Hein ("Agent Hein") walked up to JACKSON,  
17 identified themselves as law enforcement officers, and showed  
18 JACKSON their respective credentials.

19 A. Agent Beauchamp assured JACKSON he was not in  
20 trouble, and asked to speak with JACKSON about his travels.

21 B. JACKSON told Agent Beauchamp he flew from  
22 Mississippi to San Diego.

23 C. JACKSON told Agent Beauchamp he lived in  
24 San Diego, but did not know the name of the district or area  
25 of San Diego where he lived, nor did he know the address of  
26 his San Diego residence.

27 D. In response to Agent Beauchamp's request for  
28 //

1 identification, JACKSON produced a Mississippi  
2 driver's license.

3 E. JACKSON changed his story, and told Agent  
4 Beauchamp he was from Mississippi, but was trying to move to  
5 San Diego.

6 F. JACKSON told Agent Beauchamp while visiting  
7 San Diego, he planned to stay with friends but he did not  
8 know his friends' address, nor did he know their names.

9 G. JACKSON told Agent Beauchamp he planned to stay  
10 in San Diego for three (3) or four (4) days.

11 9. Agent Beauchamp asked JACKSON for permission to  
12 search the contents and interior spaces of JACKSON'S teal  
13 colored carry-on bag.

14 A. JACKSON granted consent to examine his carry-on  
15 bag, and handed it to Agent Hein.

16 B. Agent Beauchamp asked JACKSON how much money he  
17 was carrying.

18 C. JACKSON acknowledged he was carrying money,  
19 pointed to a white cloth bag in his teal colored carry-on  
20 bag, but said he did not know the dollar amount.

21 10. While examining the contents of JACKSON'S carry-on  
22 bag, Agent Hein discovered a large amount of U.S. currency in  
23 the white cloth bag.

24 A. The currency in the white cloth bag was divided  
25 into approximately 13 bundles.

26 B. Each of the bundles of currency was secured with  
27 rubber bands.

28 //

1 C. The TFOs and DEA agents were trained and  
2 experienced, and knew it was common for drug currency couriers  
3 not to know the dollar amount of money they were transporting.

4 D. The TFOs and DEA agents were trained and  
5 experienced, and knew drug currency couriers do not own the  
6 money they transport.

7 E. The TFOs and DEA agents were trained and  
8 experienced, and knew drug currency couriers are typically  
9 hired to perform a discreet task. They are given an amount  
10 of currency and a set of instructions relative to their  
11 journey. They are told where to take the money, how to get  
12 there, and how or to whom it is to be delivered. They are  
13 not, however, always told the dollar amount of the currency  
14 they are transporting.

15 F. The TFOs and DEA agents were trained and  
16 experienced, and knew it is also common for the currency  
17 carried by drug currency couriers to be subdivided into  
18 smaller lots or bundles, and secured with rubber bands.

19 11. JACKSON agreed to accompany the officers to the  
20 nearby SDIA NTF office, where the contents of JACKSON'S bag  
21 could be examined in a private setting, away from the crowds  
22 of travelers in the SDIA terminals.

23 A. Agent Beauchamp repeated to JACKSON he was not  
24 under arrest, and was free to leave.

25 B. JACKSON walked with Agent Beauchamp and  
26 Agent Hein to the nearby SDIA NTF office.

27 12. After arriving at the NTF office, Agent Beauchamp

28 //

1 again told JACKSON he was not under arrest and he was free  
2 to leave.

3 A. Agent Beauchamp and JACKSON continued to discuss  
4 JACKSON'S plans for his visit to San Diego.

5 B. JACKSON told Agent Beauchamp he was going to  
6 stay at the home of a friend in San Diego, but did not know  
7 the district or area of San Diego where the friend lived, nor  
8 did JACKSON know the friend's address.

9 C. Although JACKSON said he was planning to  
10 relocate to San Diego, he did not research the area and had  
11 no idea where in the San Diego region he would shop  
12 for housing.

13 13. Upon opening JACKSON'S carry-on bag and examining  
14 the currency in the white cloth bag, the agents immediately  
15 realized JACKSON was transporting an unusually large amount  
16 of money.

17 A. Given that JACKSON was only 23 years of age, the  
18 agents were curious about JACKSON'S personal finances.

19 B. JACKSON said in 2016, when he was 21 years of  
20 age, he worked as an electrician for his uncle.

21 C. JACKSON said his uncle paid him \$23.00 per hour,  
22 but JACKSON was paid "in cash."

23 D. The agents asked for the uncle's telephone  
24 number, so they could call the uncle and confirm JACKSON'S  
25 work history, but JACKSON refused to give the agents  
26 that information.

27 E. JACKSON told the agents he had no documentation,

28 //



1 or proof of any type, supporting his work or income history  
2 with his uncle.

3 F. JACKSON told Agent Beauchamp his earnings as an  
4 electrician were not documented in his income tax returns  
5 because he did not file income tax returns.

6 14. Agent Beauchamp asked JACKSON about his employment  
7 and income history since 2016.

8 A. JACKSON told Agent Beauchamp he was actively  
9 employed as a professional "rap" or "hip-hop" performer.

10 B. JACKSON explained other such artists paid  
11 JACKSON to perform and appear in their recordings and videos.

12 C. When the agents asked for JACKSON'S "stage" or  
13 performing name, JACKSON declined to disclose it.

14 D. When the agents asked for JACKSON to guide them  
15 to images or videos on social media of JACKSON performing,  
16 JACKSON declined to do so.

17 E. JACKSON told the agents he had no documentation,  
18 or proof of any type, supporting his work or income history  
19 as a professional "rap" or "hip-hop" performer.

20 F. JACKSON told Agent Beauchamp his earnings as a  
21 professional "rap" or "hip-hop" performer were not documented  
22 in his income tax returns because he did not file income  
23 tax returns.

24 15. Agent Beauchamp asked JACKSON several times to state  
25 the dollar amount of the currency he was carrying.

26 A. Each time JACKSON was called upon to state the  
27 dollar amount of the currency in his bag, he offered a  
28 different total.

1           B. At one point, JACKSON told Agent Beauchamp he  
2 was carrying \$10,000.00.

3           C. Later in the conversation, JACKSON told Agent  
4 Beauchamp he was carrying \$12,000.00.

5           D. At another point in the interview, JACKSON told  
6 Agent Beauchamp he was carrying \$15,000.00.

7           E. It was readily apparent to Agent Beauchamp and  
8 the other agents JACKSON had no idea how much money he  
9 was transporting.

10           F. The TFOs and DEA agents were trained and  
11 experienced, and knew that it was common for drug currency  
12 couriers not to know the dollar amount of money they  
13 were transporting.

14           G. The TFOs and DEA agents were trained and  
15 experienced, and knew drug currency couriers do not own the  
16 money they transport.

17           H. The TFOs and DEA agents were trained and  
18 experienced, and knew drug currency couriers are typically  
19 hired to perform a discreet task. They are given an amount  
20 of currency and a set of instructions relative to  
21 their journey. They are told where to take the money, how to  
22 get there, and how or to whom it is to be delivered. They  
23 are not, however, always told the dollar amount of the  
24 currency they are transporting.

25           I. The TFOs and DEA agents were trained and  
26 experienced, and knew it is also common for drug currency  
27 couriers, when contacted by law enforcement, to understate  
28 the amount of money they are transporting.

1        16. Agent Beauchamp asked JACKSON to explain why the  
2 currency inside the white cloth bag was subdivided into  
3 bundles and secured with networks of rubber bands.

4            A. JACKSON said he divided the currency by  
5 denomination to keep track of the total.

6            B. The TFOs and DEA agents were trained and  
7 experienced, and knew it is common for the currency carried  
8 by drug currency couriers to be subdivided into smaller lots  
9 or bundles, and secured with rubber bands.

10        17. The currency discovered in the white cloth bag in  
11 JACKSON'S teal colored carry-on bag was subdivided into  
12 approximately 13 bundles, each secured by rubber bands.

13        18. The currency concealed in the white cloth bag was  
14 combined, counted, and determined to have a dollar value of  
15 \$22,120.00, not \$10,000.00, or \$12,000.00, or \$15,000.00 as  
16 stated earlier by JACKSON.

17        19. The currency concealed in the white cloth bag is the  
18 defendant \$22,120 in currency.

19        20. The defendant \$22,120 in currency was made up of 629  
20 bills, in five (5) different denominations.

21            A. The defendant \$22,120 in currency consisted of  
22 124 \$100.00 bills, one (1) \$50.00 bill, 465 \$20,000.00 bills,  
23 35 \$10.00 bills, and four (4) \$5.00 bills.

24            B. Of the 629 bills making up the defendant \$22,120  
25 in currency, the great majority of the bills, to wit, 465,  
26 were in the \$20.00 denomination.

27        21. The TFOs and DEA agents had specialized training and  
28 were experienced in investigating illegal drug traffickers

1 and drug currency couriers. They knew illegal street drug  
2 sales were virtually always conducted as an exchange of drugs  
3 for currency.

4 A. The most common denomination used in illegal  
5 street drug transactions was the \$20.00 bill.

6 B. Approximately 75% of the defendant \$22,120 in  
7 currency was made up of \$20.00 bills.

8 22. On June 27, 2018, at the SDIA NTF office, in  
9 JACKSON'S presence, TFO Aiken, a trained and experienced  
10 narcotic detection dog handler, used his trained and  
11 certified narcotic detection dog, "Bagherra", to conduct an  
12 examination of the defendant \$22,120 in currency.

13 A. TFO Aiken and Bagherra were trained and  
14 certified as a dog handler and narcotic detection dog team.

15 B. Bagherra was trained to display a behavior or  
16 "alert" when she encountered the scents or odors of a variety  
17 of controlled substances.

18 C. TFO Aiken was trained and experienced in  
19 recognizing Bagherra's trained behaviors or alerts.

20 D. When exposed to the defendant \$22,120 in  
21 currency, Bagherra alerted to the presence of the scent of  
22 one or more controlled substances upon the currency.

23 E. TFO Aiken observed the alert, told Agent  
24 Beauchamp of the alert, and explained its significance.

25 23. The defendant \$22,120 in currency was seized for  
26 forfeiture by the DEA as currency constituting proceeds of  
27 the purchase(s) of controlled substances, and money possessed

28 //

1 with the intent to be furnished in exchange for  
2 controlled substances.

3 24. The defendant \$22,120 in currency constitutes money  
4 furnished or intended to be furnished in exchange for a  
5 controlled substance, in violation of Chapter 13, Title 21,  
6 United States Code.

7 25. Alternatively, the defendant \$22,120 in currency  
8 constitutes proceeds of, or proceeds traceable to, an  
9 exchange for a controlled substance, in violation of  
10 Chapter 13, Title 21, United States Code.

11 26. Alternatively, the defendant \$22,120 in currency was  
12 used or intended to be used to facilitate an exchange for a  
13 controlled substance, in violation of Chapter 13, Title 21,  
14 United States Code.

15 27. As a result of the foregoing, the defendant \$22,120  
16 in currency is liable to condemnation and to forfeiture to  
17 the United States for its use in accordance with Title 21,  
18 United States Code, §881(a)(6).

19 28. The defendant \$22,120 in currency is presently  
20 deposited within the jurisdiction of this Court.

21 //

22 //

23 //

24

25

26

27

28

1 WHEREFORE, the United States prays that due process issue  
2 to enforce the forfeiture of the defendant \$22,120 in  
3 currency, and that due notice be given to all interested  
4 parties to appear and show cause why said forfeiture should  
5 not be declared.

6 DATED: November 29, 2018

7 ADAM L. BRAVERMAN  
8 United States Attorney

9 s/ Bruce C. Smith  
10 BRUCE C. SMITH  
11 Assistant U.S. Attorney  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



VERIFICATION

I, Jeanne Beauchamp, state and declare as follows:

1. I am a special agent with the Drug Enforcement Administration, assigned to San Diego Integrated Narcotics Task Force Team 8, and am one of the task force officers assigned to this investigation.

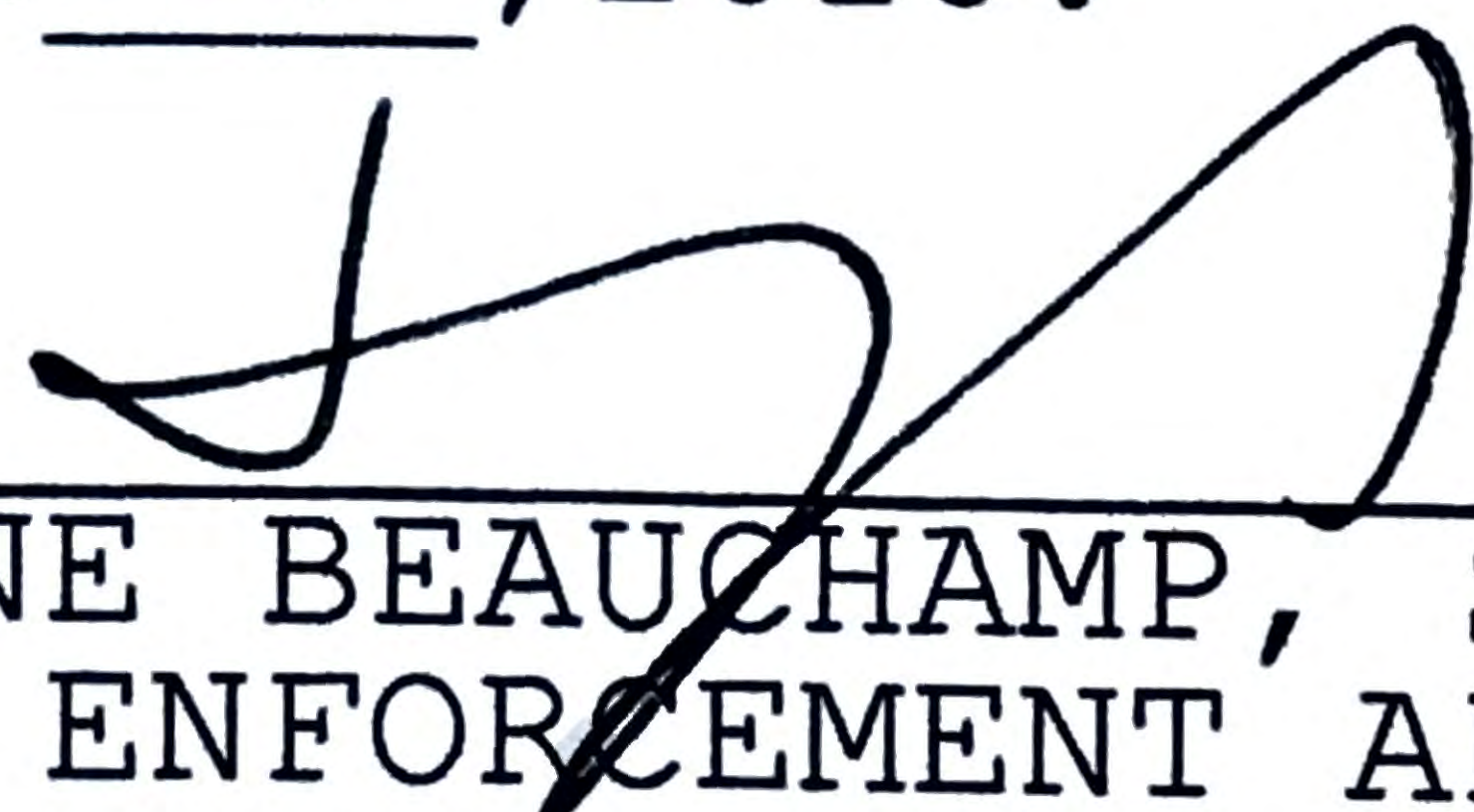
2. I have read the foregoing Complaint For Forfeiture and know its contents.

3. The facts set forth in the Complaint For Forfeiture are based upon my own knowledge or were facts furnished to me by other United States federal, state, or local law enforcement personnel, civilian witnesses, or other official Government sources.

Based on this information, I believe the allegations in the Complaint For Forfeiture to be true.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief.

Executed on November 27, 2018.

  
\_\_\_\_\_  
JEANNE BEAUCHAMP, SPECIAL AGENT  
DRUG ENFORCEMENT ADMINISTRATION



## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

AUSA Bruce C. Smith, Phone: (619) 546-8266

USAO, 880 Front Street, Room 6293, San Diego, CA 92101-8893

**DEFENDANTS**

\$22,120.00 in U.S. Currency

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

**'18CV2697 DMS NLS**

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |  | PTF                        | DEF                        |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**21 U.S.C. Section 881**

Brief description of cause:  
**Narcotics trafficking**

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

11/29/2018

s/ Bruce C. Smith

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_